

-FILED-

MAR 27 2023

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA**At _____ M
Chanda J. Berta, Acting Clerk
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA[This form is for prisoners to sue for civil rights violations. NEATLY print in ink (or type) your answers.]Rodrick L. Davis[You are the **PLAINTIFF**, print your full name on this line.]v. Fort Wayne Police Dept.
Police Chief Steve Reed[The **DEFENDANT** is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

Case Number

1:23CV130

[For a new case in this court, leave blank.

The court will assign a case number.]

[The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]

PRISONER COMPLAINT

#	Defendant's Name and Job Title	Work Address
1	[Put the defendant named in the caption in this box.] <u>Fort Wayne Police Department</u> <u>Chief Steve Reed</u>	<u>1 E. Main St #108</u> <u>Ft. Wayne Ind. 46802</u>
2	[Put the names of any other defendants in these boxes.] <u>Fort Wayne Police Department</u> <u>Detective Calvin Dubois</u>	<u>Fort Wayne Police Dept</u> <u>1 E. Main St. #108</u> <u>Ft. Wayne Ind. 46802</u>
3	<u>Fort Wayne Police Department</u> <u>Officer Aaron Bloomfield</u>	<u>Ft. Wayne Police Dept</u> <u>1 E. Main St. #108</u> <u>Ft. Wayne Ind. 46802</u>

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and work address of each defendant in a separate box as shown here.]

1. How many defendants are you suing? 7
2. What is the name and address of your prison or jail? Allen County Jail
417 S. Calhoun St. Fort Wayne Ind. 46802
3. Did the event you are suing about happen there? ☐ Yes. ☒ No, it happened at: Allen Co. Superior Courts 715 S. Calhoun St. Ft. Wayne Ind.
4. On what date did this event occur? June 22, 23, and 24 2021

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

DO NOT: Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how each defendant violated your rights.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

DO NOT: Include social security numbers, dates of birth, or the names of minors.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. [The first paragraph has been numbered for you.]

1. July 17, 2020 I was charged with Burglary, Domestic Battery, Residential Entry, and Invasion of Privacy, 02D04-2007-F3-000057. While in jail in Aug. 2020, I read Officer Bloomfield's Police Report and Probable Cause Affidavit and seen the pictures in evidence. All of this was the original evidence in the Motion For Discovery.
2. Fear phone calls between myself and the victim Adrienne Knight, while I was in jail. This is where threats from the Prosecutor Tasha Lee started. Ms. Knight was threatened by Tasha Lee, that she would be incarcerated and charged with perjury if she confessed I was innocent of the crimes I was being charged.
3. Tasha Lee continued pushing back my trial. Doing so Tasha Lee, Kaeniah Gatakalala, and Detective Dubois conspired to falsify this case against me. Because the evidence from July 17, 2020 proved my innocence. This was clear to see when trial started June 22 2021, as the Motion for Discovery was missing Arresting Officer Bloomfield's Police Report and Probable Cause Affidavit. Also the victim Adrienne Knight told a different lie on the stand from what she said,

Claims and Facts (continued)

- ... told July 17, 2020, Officer Bloomfield and Officer Douglas even got on the stand after Ms. Knight and repeated the EXACT SAME LIE. Detective Dubois is where this lie originated from. Detective Dubois is who had the victim and witnesses presenting this lie at trial. This is how and why.
4. Detective Dubois is who met with Adrienne Knight and relayed Tasha Lee threats of perjury and incarceration. Detective Dubois is also the one that concocted the new lie that Ms. Knight was now saying. Detective Dubois also relayed this new lie to Officer Bloomfield and Officer Douglas, to have them collaborate this lie that Ms. Knight would now be saying. Detective Dubois then relayed this lie to Tasha Lee and KARNIA GATAKALA in order for the two of them to prepare their questions for trial. Detective Dubois with authorization from Tasha Lee removed Officer Bloomfield Police Report and Probable Cause Affidavit from evidence, because they would clearly contradict this new lie Ms. Knight would be saying. Detective Dubois then retyped the Probable Cause Affidavit to try to make it solidify the lie Detective Dubois and Tasha Lee now had Ms. Knight saying.
5. July 17, 2020 Officer Bloomfield wrote in his Report and Affidavit, that Ms. Knight told him I knocked her out or hit her several times as soon as I came in the house. Bloomfield also wrote that he was flagged down by Ms. Knight from her truck, and wrote how all the blood was all over Ms. Knight and inside her truck.

5. When did this event happen?

☐ Before I was confined.

☒ While I was confined awaiting trial.

☐ After I was convicted while confined serving the sentence.

☒ Other: confined awaiting trial and at trial

6. Have you ever sued anyone for this exact same event?

☒ No.

☐ Yes, attached is a copy of the final judgment OR an additional sheet listing the court, case number, file date, judgment date, and result of the previous case(s).

7. Could you have used a prison grievance system to complain about this event?

☒ No, this event is not grievable at this prison or jail.

☐ Yes, I filed a grievance and attached is a copy of the response from the final step.

☐ Yes, this event was grievable, but I did not file a grievance because _____

8. If you win this case, what do you want the court to order the defendant(s) to do?

[NOTE: A case filed on this form will not overturn your conviction or change your release date.]

I would like for Tasha Lee to be removed as Prosecutor
And Detective Dubois removed as detective. Though also I want
to be compensated five million dollars. For the defendants
robbing me of fifteen years of my freedom. For a case
they knew I was innocent of.

[Initial Each Statement]

RLD I will pre-pay the filing fee OR file a prisoner motion to proceed in forma pauperis.

RLD I will keep a copy of this complaint for my records.

RLD I will promptly notify the court of any change of address.

RLD I WILL NOT send more than one copy of any filing to the court.

RLD I WILL NOT send summons, USM-285, or waiver forms to the clerk.

RLD I declare under penalty of perjury that the statements in this complaint are true.

I placed this complaint in the prison mail system on 3/23/2023 at 10:30 am/pm.

[Do not fill in this date and time until you give the complaint to prison officials to send to the court.]

Yorick Davis

Signature

ACT# 185472
 DOC# 933721

Prisoner Number

Defendants Name And Title

Address

4. Fort Wayne Police Department
Officer Douglas
5. ~~Allen County Prosecutors Office~~
~~Head Prosecutor Karen Richards~~
Allen County Prosecutor
6. Tasha Lee
Allen County Prosecutor
7. KARENIA GRATA KALA
Allen County Prosecutors Office
5. Head Prosecutor Mike McAlexander

Fort Wayne Police Dept # 458
13. Main St. Ft. Wayne Ind. 46802
Prosecutors Office 46802
602 S. Calhoun St. Ft. Wayne Ind.
Prosecutors Office 46802
602 S. Calhoun St. Ft. Wayne Ind.
Prosecutors Office 46802
602 S. Calhoun St. Ft. Wayne Ind.
Prosecutors Office 46802
602 S. Calhoun St. Ft. Wayne Ind.
Prosecutors Office 46802

Claim And Facts

6. June 23, 2021 Aderenne Knight took the stand and told a completely different lie, then the story I read in evidence in the Motion for Discovery in August 2020. Ms. Knight now said I charged her outside. Though clearly said she never felt me hit her or don't remember me hitting her. Officer Bloomfield took the stand after Ms. Knight and repeated the same lie, and this totally contradicts everything Officer Bloomfield wrote in his Police Report And Probable Cause, that he was told and witnessed from Ms. Knight July 17, 2020. Officer Douglas even repeated this lie on the stand.
7. June 22, 23, and 24 2021, the Motion for Discovery had a Probable Cause that was typed by someone and signed by Officer Douglas. Though Officer Douglas never speaks with the victim Ms. Knight, and clearly says that everything he knows was told to Officer Bloomfield. If what Officer Bloomfield has to say is so important. Why couldn't we read his Police Report And Probable Cause? Because reading them would prove my innocence. Though also it would prove that this case was falsified and...

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... fabricated against me by Tasha Lee, KARNIA GATAKALA, Detective Dubois, Officer Bloomfield, and Officer Douglas.

8. Tasha Lee and KARNIA GATAKALA conspired with Detective Dubois to fabricate this case, BECAUSE if they had NOT. When Ms. Knight took the stand at trial, Tasha Lee would've asked Ms. Knight questions that would've reflected the story that Ms. Knight told Officer Bloomfield July 17, 2020. Even more Ms. Knight was not asked any questions about the statement she made at deposition. This proves that Tasha Lee knew of the removal of Officer Bloomfield's Police Report. Also it proves that she knew this new lie was being said and had her questions prepared and lined up with it. BECAUSE questioning Officer Bloomfield's Police Report, would bring into question what he was told and witnessed of Ms. Knight July 17, 2020. Doing this would jeopardize Bloomfield being able to corroborate the new lie. BECAUSE Bloomfield would have to be truthful about his Report, and it would have to be presented as evidence, for Tasha Lee to go with this new lie. She has to steer as far away as possible from Officer Bloomfield's Police Report. Doing so proves Tasha Lee was presenting a case full of lies to the jury. There's not one picture in evidence of blood in our house, in front of our house, or a blood trail down the street, whereas they said on the stand Ms. Knight flagged down Bloomfield. BECAUSE this never happened. It's all lies being told.

9. The conspiracy between Detective Dubois, Tasha Lee, and Kaenina Gatakala was clear to see from Detective Dubois sitting at the States table throughout trial. Then being called to the stand as a witness after he sat and heard testimony from the other witnesses and victim. This was clearly a major conflict of interest.
10. Calvin Dubois is a Detective with the Fort Wayne Police. Detective Dubois is paid by the Fort Wayne Police Department. During this trial his role was to be impartial. All he was to do was present evidence to the prosecutor and be called as a witness. For Detective Dubois to be sitting with the prosecutors throughout trial, either one of two things were happening. Either Detective Dubois was being paid by the State or he was being paid by Tasha Lee to falsify witness statements and intimidate the victim Ms. Knight. Detective Dubois was there to help secure Tasha Lee's guilty conviction. Officer Blumfield's testimony and the new Probable Cause Affidavit was set. All that was needed was to make sure Ms. Knight got on the stand and repeated the new lie that Detective Dubois came up with.
11. Detective Dubois' main reason for sitting at the States table was to finalize the intimidation to Ms. Knight when she walked in the Court room to testify. Dubois' presence was to scare Ms. Knight that she would be incarcerated for perjury by Tasha Lee. If she did not repeat the new lie Detective Dubois came up with,

- # 4
12. For Ms. Knight to say one lie July 17, 2020, then to say another lie at deposition, then ~~for~~ to say a totally different lie on the stand at trial. Then for Officer Bloomfield and Detective Dubois to get on the stand and repeat the same lie. To collaborate this lie clearly shows someone had to give this information to Officer Bloomfield. Because Officer Bloomfield's Police Report says something totally different about what he was told and witnessed on July 17, 2020 from Ms. Knight. It shows coercion to validate the lies being told. Though how could I make a defense to allegations I knew nothing of? I built my defense around Officer Bloomfield's Police Report and Probable Cause Affidavit. This new lie at trial was my first time hearing it. How could I defend against it?
 13. This case was a conspiracy from start to finish. From Tasha Lee charging me with Burglary for going in my own home with the key, to trying to revoke my bond after I bonded out, to her allowing Detective Dubois to sit with her at the states table. Then calling him to the stand as a witness. After letting him sit and hear all the testimonies from the other witnesses and Ms. Knight, Dubois job was to receive evidence and present it to the prosecutor. It was not his job to remove Police Reports and Probable Causes and change witness statements as well as Ms. Knight's own story. Though this is what happened, and it clearly shows the three of them, Lee GATA Kala and Dubois, conspired to have me found guilty of these falsified charges and case.

14. Detective Dubois was the investigator that put the case together with and for Tasha Lee. Detective Dubois was the one given authorization from Tasha Lee to go through the Motion for Discovery, and remove Police Reports after victim statements as well as witness testimony. Tasha Lee authorized Detective Dubois to do this, because from the evidence gathered July 17, 2020 from Officer Bloomfield from the victim Ms. Knight's statement and picture evidence gathered, it was clear to see I was innocent of the domestic battery. Being innocent of entering the house and putting my hands on Ms. Knight. The Burglary would have to then be dismissed. This is why Tasha Lee allowed Detective Dubois to remove Bloomfield's Report and Affidavit. Then allowed Dubois to coerce Ms. Knight to tell this new lie at trial, and Officer Bloomfield and Officer Douglas to collude. Because ~~for~~ for Detective Dubois to come up with another Domestic Battery charge, would allow Tasha Lee to continue to charge me with this frivolous Burglary charge. This is why a ~~sub~~ subpoena of Officer Bloomfield's Police Report and Probable Cause Affidavit. Would prove the falsifying of this case against me. A Motion to Compel Original Evidence from July 17, 2020, would prove how Tasha Lee, Kania Gatakala, and Detective Dubois fabricated this Domestic Battery charge against me. In order for Tasha Lee to charge me with the Burglary. When she clearly knew I was innocent of these charges.

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15. Officer Bloomfield was the Arresting Officer July 17, 2020. Officer Bloomfield's Police Report And Probable Cause Affidavit, that was removed from the Motion for Discovery At trial June 22, 2021, are most important. For they would prove that Tasha Lee And Detective Dubois falsified this case against me. Doing so shows their malicious intent to have me found guilty of these charges, and sentenced to the maximum sentence of a level three felony Burglary.
16. Found guilty at trial by a bias jury and falsified evidence, I was sentenced to fifteen years for Burglary and two and a half years each for Domestic Battery Invasion of Privacy and Residential Entry. With my Post Conviction ~~Argument~~ Relief filed, I'm looking to have this sentence overturned or vacated. I'm now filing a 42 U.S.C. 1983 inmate complaint ~~with~~ ~~the~~ ~~Attorney~~ for the violation of my Constitutional Right to a fair trial as an American citizen.

11.22.22

Signature
Dorice Davis

Krystal P. Davis
11/22/22

